

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

UNITED STATES OF AMERICA, )  
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 )  
v. ) Crim. No. 1:19-cr-00007-JAW  
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 )  
DOUGLAS GORDON. )  
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**MOTION TO AMEND CONDITIONS OF RELEASE**

**NOW COMES** the United States of America, by and through its attorneys, Halsey B. Frank, United States Attorney and James M. Moore, Assistant U.S. Attorney and hereby requests that the Court amend the conditions of release. (Docket No. 19). For the reasons set forth below, the United States respectfully requests that the Court amend its January 31, 2019 order.

On January 31, 2019, the parties agreed during the Defendant's arraignment to a joint motion setting forth additional conditions of release. The Government withdrew its motion for detention as a result of the agreement between the parties. The Court accepted the joint motion of the parties. The conditions of release entered on the docket do not accurately set forth the agreed-upon and accepted conditions of release. After the January 31, 2019 arraignment, the undersigned Assistant U.S. Attorney agreed at the request of the U.S. Pretrial Services Office to a revision of the pretrial conditions.<sup>1</sup> The revised conditions were forwarded to defense counsel on February 2, 2019. **The Defendant does not have any objection to the proposed revision.**

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<sup>1</sup> While the parties had agreed and the Court had accepted a condition of release which prohibited the Defendant from operating a website or using the U.S. States Postal Service or any private or commercial interstate carrier without permission of the Supervising Officer, the revision to condition 7(t) states, "Defendant shall not sell or distribute any DVDs or any copyright-protected works." The remaining terms of condition 7(t) regarding financial information and computer monitoring are acceptable to the parties.

The proposed revision is less restrictive than the terms agreed upon by the parties on January 31, 2019.

**WHEREFORE**, the United States respectfully requests that the Court enter an amended order which includes the attached Additional Conditions of Release that were further revised at the request of the U.S. Pretrial Services Office. The Defendant through his attorney and the Government are in agreement regarding these revised conditions.

Dated at Bangor, Maine this 7<sup>th</sup> day of February, 2019.

Respectfully submitted,

HALSEY B. FRANK  
UNITED STATES ATTORNEY

**BY: /s/ JAMES M. MOORE**  
JAMES M. MOORE  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on February 7, 2019, I electronically filed the Government's Motion to Amend Conditions of Release with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Stephen C. Smith, Esq. at [ssmith@lipmankatz.com](mailto:ssmith@lipmankatz.com)

HALSEY B. FRANK  
UNITED STATES ATTORNEY

/s/ James M. Moore  
James M. Moore  
Assistant U.S. Attorney  
U.S. Attorney's Office  
202 Harlow Street  
Suite 111  
Bangor, Maine 04401  
Tel: 207-945-0373  
[jim.moore@usdoj.gov](mailto:jim.moore@usdoj.gov)